

MEMO ENDORSED.

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October 8, 2024

VIA ECF

Honorable Ona T. Wang, U.S.M.J.
United States District Court, Southern District of New York
500 Pearl Street, Courtroom 20D
New York, New York 10007

Re: Johnson v. City of New York, et al.
Docket No.: 23-CV-2407 (JGLC) (OTW)

Application **GRANTED**. The conference is adjourned to **October 29, 2024 at 10:30 a.m.**

SO ORDERED.



Ona T. Wang
U.S.M.J.

Oct. 9, 2024

Dear Judge Wang:

My name is Stephen Mc Quade, Esq., and I am a Partner with the law firm of Pitta LLP, attorneys for Angelo Erland Lessey, who is a named-Defendant in connection with the above-referenced matter and who is a member in good standing with the Correction Captains' Association, Inc. ("Union").

In conformance with Section 1(e) of Your Honor's Individual Practices in Civil Cases, I write to request an adjournment of the status conference currently scheduled for October 16, 2024 ("Conference"). (*See* Dkt. 85).

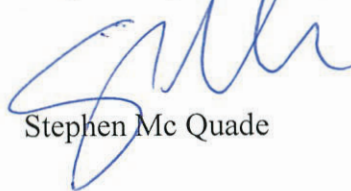
By way of background, the parties hereto are currently in the process of engaging in fact discovery having exchanged written disclosures and responsive documents, as well as conducted the depositions of all five named-Defendants. (*See* Dkt. 83). As indicated in Plaintiff's letter to the Court, dated September 26, 2024, the completion of Plaintiff's deposition, the responses to Plaintiff's post-deposition discovery demands, and the exchanging of *Monell* discovery, if at all, remain outstanding. (*See* Dkt. 84).

As stated above, the Conference is currently scheduled for October 16, 2024. However, after conferring with the other, respective counsel herein, we all have previously-scheduled, professional engagements that directly conflict with the date/time of the Conference. As such, I write the Court, with consent from all parties hereto, to request an adjournment of the Conference. Please be advised that this is the first request being made by Defendant Lessey to adjourn the Conference and that the instant request is being made more than 48 hours in advance of the

Conference. Additionally, after conferring with the other, respective counsel herein, we jointly propose October 29, 2024 for your consideration regarding the rescheduling of the Conference.

The undersigned thanks the Court for the time and attention to the issues presented herein.

Respectfully submitted,



Stephen Mc Quade

cc: All Counsel of Record (*via ECF*)